

EXHIBIT “3”

In The Matter Of:
TILLMAN, et al. vs.
RIVERTON MEMORIAL HOSPITAL, LLC

KATHLEEN HIRSCH-LANUTE
October 25, 2022

T&T Reporting, LLC
477 Shoup Avenue, Suite 105
Idaho Falls, Idaho 83402
(208) 529-5491

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF WYOMING

4 JUNE LOUISE TILLMAN and CATHY ANN)
5 LUCAS, Co-Wrongful Death)
Representatives FOR ELAINE J.) Case No.
TILLMAN, Deceased,) 21-CV-138-NDF
6)
7 Plaintiffs,)
vs.)
8)
9 RIVERTON MEMORIAL HOSPITAL, LLC,)
10 Defendant.)

14 Tuesday, October 25, 2022, 1:00 p.m.

25 **Reported by:** Sheila T. Fish, CSR #906, RPR, CRR

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1 they require.

2 Usually, they'll come in, they introduce
3 themselves. They generally do not tell us what they
4 are there for. They tell us they are there for an
5 investigation. They do not clarify what the
6 investigation is. And they ask for a pile of
7 documents. Usually, it will be a group of charts,
8 and in that group of charts, they look for a like
9 diagnosis and usually whatever they're investigating
10 is one of the patients in that group of charts.

11 They ask for policies. They ask for
12 qualifications of staff. Sometimes they ask for
13 personnel records. But we supply all of those
14 documents for them. We assist them in looking
15 through the medical records because a lot of the
16 surveyors are not adept with the electronic medical
17 record. You know, supply them with anything that
18 they ask for, basically.

19 Q. When you say that you were present for
20 the CMS action, does that mean that you were there
21 for the visit?

22 A. I was, yes. I was there when he
23 arrived, introduced myself. I sat there through the
24 introduction and supplied him with the information he
25 needed. At some point he asked to interview staff

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1 privately, and we did excuse ourselves during those
2 interviews.

3 Q. So at what point after the attack did
4 you fly to Wyoming?

5 A. Monday. Monday morning.

6 Q. Okay. So you came in on Monday, and you
7 stayed obviously --

8 A. I don't remember. It may have been
9 Sunday.

10 Q. But you were there for the unannounced
11 CMS visit?

12 A. Oh, yes.

13 Q. So were you there when they interviewed
14 each of the staff members?

15 A. I was not. He asked to do that in
16 private.

17 Q. Who did he interview? Was it a he? I'm
18 sorry. I'm just assuming. I don't know why.

19 A. I can't remember off the top of my head.
20 I know George Plumlee was one of them.

21 Q. And then were you involved in the
22 response to their investigation?

23 A. I was.

24 Q. When you were in other positions before
25 2017, you had some involvement writing sitter